

James R. Condo (#005867)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, Arizona 85004-2202
Telephone: 602.382.6000
Facsimile: 602.382.6070
jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com
Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Case No. 2:15-MD-02641-DGC

IN RE: Bard IVC Filters Products Liability
Litigation

**DEFENDANTS C. R. BARD INC. AND
BARD PERIPHERAL VASCULAR
INC.'S NOTICE OF SERVICE OF
CASE_SPECIFIC EXPERT
DISCLOSURES RELATED TO TINLIN
MATTER**

(Assigned to the Honorable David G.
Campbell)

(Tinlin Bellwether Case)

Pursuant to Amended Case Management Order No. 39, filed November 26, 2018,
Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc., by and through counsel,
hereby give notice that on January 7, 2019,¹ they served on Plaintiffs, via U.S. Mail and

¹ Plaintiffs and Bard agreed to move the deadline for Bard's case-specific expert disclosures in the *Tinlin* matter to January 7, 2019.

1 email, the following written case-specific expert reports related to Bellwether Plaintiff
2 Debra Tinlin:

3 • Expert disclosure of Christine Brauer, Ph.D. Dr. Brauer submitted her
4 original MDL Report in April 2017, and her supplemental MDL Report concerning the
5 Meridian and Denali Filters in May 2017. At the time of those Reports, Dr. Brauer did not
6 have access to FDA's down-classification memoranda (the "Price Memos"). Accordingly,
7 Dr. Brauer has prepared a Supplemental Report dated July 17, 2018, that includes
8 reference and discussion of the Price Memos. Aside from formatting changes and
9 corrections of typographical errors, Dr. Brauer's Supplemental Report does not contain
10 any other new or different substantive information not previously disclosed in her prior
11 Reports. Dr. Brauer's July 2018 Supplemental Report also combines her original April
12 2017 MDL Report and her May 2017 Meridian and Denali Report to create a single
13 Report.

14 • Expert disclosure of Paul Briant, Ph.D., P.E.
15 • Expert disclosure of Audrey A. Fasching, Ph.D., P.E.
16 • Expert disclosure of Michael Miller, M.D.
17 • Expert disclosure of Christopher S. Morris, M.D.
18 • Expert disclosure of David S. Owens, M.D.
19 • Expert disclosure of Piotr S. Sobieszczyk, M.D.
20 • Expert disclosure of Donna Bea Tillman, Ph.D., M.P.A. Dr. Tillman
21 submitted her original MDL Report in April 2017, and her supplemental MDL Report
22 concerning the Meridian and Denali Filters in May 2017. At the time of those Reports, Dr.
23 Tillman did not have access to FDA's down-classification memoranda (the "Price
24 Memos"). Accordingly, Dr. Tillman has prepared a Supplemental Report dated July 12,
25 2018, that includes reference and discussion of the Price Memos. Aside from formatting
26 changes and corrections of typographical errors, Dr. Tillman's Supplemental Report does
27 not contain any other new or different substantive information not previously disclosed in
28

her prior Reports. Dr. Tillman's July 2018 Supplemental Report also combines her original April 2017 MDL Report and her May 2017 Meridian and Denali Report to create a single Report.

DATED this 7th day of January, 2019.

/s/ Richard B. North, Jr.

Richard B. North, Jr.

Georgia Bar No. 545599

Matthew B. Lerner

Georgia Bar No. 446986

NELSON MULLINS RILEY & SCARBOROUGH,
LLP

Atlantic Station

201 17th Street, NW / Suite 1700

Atlanta, GA 30363

PH: (404) 322-6000

FX: (404) 322-6050

Richard.North@nelsonmullins.com

James R. Condo (#005867)

SNELL & WILMER L.L.P.

One Arizona Center

400 E. Van Buren

Phoenix, AZ 85004-2204

PH: (602) 382-6000

JCondo@swlaw.com

ASheridan@swlaw.com

**Attorney for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 7, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Richard B. North, Jr.

Richard B. North, Jr.
Georgia Bar No. 545599
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Atlantic Station
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
PH: (404) 322-6000
FX: (404) 322-6050
Richard.North@nelsonmullins.com

**Attorney for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.**

Nelson Mullins Riley & Scarborough

LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
(404) 322-6000